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Attorney for Catalina Orozco-Alvarez

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,	)
	) NO. 4:22-cr-06021-SAB
Plaintiff,	)
	) MOTION AND
vs.	) DECLARATION TO
	) CONTINUE PRE-TRIAL CONFERENCE
JORGE BALLESTEROS,	) AND JURY TRIAL
	)
	) With Oral Argument
	) June 23, 2022
Defendant.	) 9:30 a.m. Yakima, WA.

COMES NOW the Defendant, Jorge Ballesteros, by and through her attorney of record, Ricardo Hernandez, and moves this court for an order continuing the Pre-Trial set for June 23, 2022 @ 9:30 a.m. and Jury Trial hearing dates set for July 5, 2022 @ 9:00 a.m. This motion is based upon the court file in the instant case, and the accompanying declaration of counsel.

DATED this 17<sup>th</sup> day of June 2022.

s/ Ricardo Hernandez  
Ricardo Hernandez

**DECLARATION**

RICARDO HERNANDEZ, being first duly sworn upon oath, deposes and

States as follows:

1. I am the attorney of record for the defendant in the above matter.
2. I am requesting a continuance of the Pre-Trial set for June 23, 2022 @ 9:30 a.m. and Jury Trial hearing date set for July 11, 2022 @ 9:00 a.m.
3. For the following reasons defense counsel is requesting a continuance of the current trial & Pretrial dates.
4. Defense counsel recently received discovery and needs additional time to review discovery with the defendant.
5. Counsel is also requesting an extension of the deadline to file pre-trial motions.
6. The defendant agrees with the need to continue the pre-trial & trial dates and has agreed to waive her right to speedy trial.
7. The government has no objection to the continuance.

I hereby certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 17<sup>th</sup> day of June 2022

s/ Ricardo Hernandez  
Ricardo Hernandez

**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2022 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Caitlin A. Baunsgard, Assistant U.S. Attorney.

/s/ Ricardo Hernandez  
Ricardo Hernandez

MOTION AND DECLARATION TO CONTINUE